

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEANA BARENBOIM, JOSE ORTIZ, and
REVANS RAGBIR, on behalf of themselves
and all others similarly situated,

Plaintiffs,

vs.

STARBUCKS CORPORATION,

Defendant.

Civ. Action No. 08-cv-03318-LTS

**DECLARATION IN SUPPORT OF STARBUCK CORPORATION'S
MOTION FOR CONSOLIDATION**

I, SAMIDH GUHA, an attorney duly licensed to practice law before the United States District Court for the Southern District of New York, do hereby declare as follows:

1. I am a partner at the law firm of Akin Gump Strauss Hauer & Feld LLP, which represents Defendant Starbucks Corporation in the above-captioned matter (the “*Barenboim Action*”) and in *Harayda v. Starbucks Corporation*, Civil Action No. 7:08-cv-4182-WCC, currently pending before the Honorable William C. Conner in the United States District Court for the Southern District of New York (the “*Harayda Action*”). I respectfully submit this Declaration in support of Starbucks Corporation’s Motion to Consolidate the *Harayda Action* with the *Barenboim Action*.

2. I am familiar with the facts and circumstances of this case and make this Declaration on the basis of my personal knowledge.

3. I certify that I have spoken with counsel for Plaintiff Harayada, who has consented to the consolidation of the *Harayda* Action with the *Barenboim* Action.

4. Based upon my review of both the *Harayda* Action and *Barenboim* Action in this pending matter, I respectfully submit that (i) the *Harayda* Action and *Barenboim* Action present virtually identical factual and legal claims, (ii) the classes the *Barenboim* Action and *Harayda* Action plaintiffs seek to represent are virtually identical; and, (iii) the cases also involve common questions of law and fact.

Respectfully submitted,

DATED: May 22, 2008

/s/

Samidh Guha
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ATTORNEY FOR DEFENDANT
STARBUCKS CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Declaration in Support of Starbuck Corporation's Motion for Consolidation was served this 22 day of May, 2008 via the ECF filing system (registered users) or via U.S. Mail on the following:

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/s/

Samidh Guha